

**FINANCIAL MANAGEMENT SERVICE'S
RECLAMATION OF DIRECT DEPOSIT
POST-DEATH BENEFIT PAYMENTS**

OIG-00-031

January 20, 2000



Office of Inspector General

United States Department of the Treasury



OFFICE OF
INSPECTOR GENERAL

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

January 20, 2000

MEMORANDUM FOR RICHARD L. GREGG, COMMISSIONER
FINANCIAL MANAGEMENT SERVICE

FROM: Dennis S. Schindel *Dennis Schindel*
Assistant Inspector General for Audit

SUBJECT: Financial Management Service's Reclamation
of Direct Deposit Post-Death Benefit
Payments

This memorandum transmits our final audit report of the *Financial Management Service's Reclamation of Direct Deposit Post-Death Benefit Payments*. The objective of our review was to determine whether the Financial Management Service (FMS) had taken adequate corrective actions to implement the recommendations in the Office of Inspector General (OIG) audit report titled *Audit Report of Financial Institutions Processing of Direct Deposit Electronic Funds Transfer (DD/EFT)*, OIG-93-044, dated March 25, 1993.

Our audit revealed that FMS made significant progress towards implementing the recommendations contained in OIG-93-044. However, action is needed to recover post-death benefit payments in the most cost-effective manner. Therefore, we recommended that FMS impose a fee against those financial institutions that do not comply with the requirements for returning Government payments.

Our findings are summarized in the Overview and explained in further detail in the Audit Results sections of the report. Also, our recommendation to address financial institutions that do not process reclamations through the Automated Clearing House (ACH) is contained in the applicable sub-section of the Audit Results.

In its response dated December 21, 1999, and included as Appendix 3, FMS management agreed that all returns should be by ACH, and proposed an alternative to the charging of fees. Among the actions FMS has taken or plans to take are a revision to the *Green Book*, and continued work with the financial community, including National Automated Clearing House Association, to improve the processing of reclamations.

Page 2

In addition, a review to determine if the entire reclamation process can be automated is planned for June 2000. Automation of the process would obviate the need to assess fees. The OIG believes that the proposed actions address the intent of the recommendation.

We appreciate the courtesies and cooperation provided to our auditors during the audit. If you wish to discuss this report, you may contact me at (202) 927-5400, or a member of your staff may contact Maria V. Carmona, Acting Director, Program Audits, at (202) 283-1591.

Attachment

TABLE OF CONTENTS

OVERVIEW	1
BACKGROUND	2
OBJECTIVE, SCOPE, AND METHODOLOGY	3
AUDIT RESULTS	3
Actions Taken to Ensure Financial Institutions Meet All Conditions for Limiting Liability	3
Action Should Be Taken to Ensure Financial Institutions Return Reclamation Payments in a Cost-Effective Manner	6
APPENDICES	
1. Status of OIG-93-044 Recommendations.....	9
2. Abbreviations	12
3. Management Response	13
4. Major Contributors to This Report	16
5. Report Distribution.....	17

Overview

This report presents the results of our audit to determine whether the Financial Management Service (FMS) fully implemented the recommendations contained in the Office of Inspector General (OIG) audit report titled *Audit Report of Financial Institutions Processing of Direct Deposit Electronic Funds Transfer (DD/EFT)*, OIG-93-044, dated March 25, 1993. The recommendations were designed to save the Government unnecessary check processing and interest costs by requiring that financial institutions promptly return post-death payments electronically upon learning of the death of the beneficiary. We conducted this audit from September 1998 through February 1999, as part of the OIG's *Office of Audit Annual Plan for Fiscal Year 1999*.

Our audit revealed that FMS made significant progress towards implementing the recommendations cited in OIG-93-044, as illustrated in Appendix 1 of this report. Specifically, FMS: (1) redesigned the FMS 133, *Notification of Reclamation*, to clarify the financial institution's liability; (2) resolved the reclamation processing discrepancies between the *Field Operations Manual* (FOM) and the *Green Book*; and (3) worked with payor agencies to ensure death notification information is timely shared with other agencies.

While the above actions improved the reclamation process, further action is needed. We found that financial institutions continued to send paper checks for full refund reclamation payments rather than use the Automated Clearing House (ACH). We believe that, because FMS took no action to impose a processing or service fee against those financial institutions that did not comply with the regulations, the financial institutions continued to be non-compliant. Therefore, we recommended that FMS impose a processing or service fee against non-compliant financial institutions to recover the Government's money in the most cost-effective manner.

In its response dated December 21, 1999, and included as Appendix 3, FMS management agreed that all returns should be by ACH, and proposed an alternative to the charging of fees. Among the actions FMS has taken or plans to take are a revision to the *Green Book*, and continued work with the financial community, including National Automated Clearing House Association (NACHA), to improve the processing of reclamations.

In addition, a review to determine if the entire reclamation process can be automated is planned for June 2000. Automation of the process would obviate the need to assess fees. The OIG believes that the proposed actions address the intent of the recommendation.

Background

As the Federal Government's financial manager, FMS is responsible for managing the Government's cash flows efficiently, effectively, and securely. The six FMS Regional Financial Centers (RFC), under the management of the Assistant Commissioner for Regional Operations, issue payments for almost all Federal agencies, including benefit payments authorized by the Office of Personnel Management (OPM), the Railroad Retirement Board (RRB), and the Social Security Administration (SSA). RFCs transmit DD/EFT benefit payments through an ACH, thereby eliminating the cost of printing and mailing paper checks. ACH is a nationwide electronic payments system used by participating financial institutions, corporations, the Government, and consumers.

FMS recovers recurring Government benefit payments paid after the death of a recipient or beneficiary (i.e., post-death payments) from financial institutions through its reclamation process. Requirements for this process are contained in the *Green Book*, which was provided to all financial institutions and participating Federal agencies.

To initiate the reclamation process, the payor agency sends a Standard Form 1184 (SF 1184), *Stop Payment Action*, to its designated RFC on magnetic tape. The RFC then prepares and forwards an FMS 133 to the financial institution. The FMS 133 contains the date the recipient died and requests payment recovery, as well as information related to financial transactions occurring after that date. Financial institutions are required to respond to the FMS 133 in a timely manner. If reimbursement is not received within 60 days of the initial notice, the Federal Government is authorized to debit the financial institution's Federal Reserve account for the outstanding balance. Additionally, full payments must be returned through the ACH. Partial payments may be returned via paper checks.

Upon receipt of the FMS 133 from a financial institution, the *FOM* directs the RFC to verify the financial institution's liability claim. Generally, the financial institution is fully liable for all payments received after learning of the recipient's death. However, the financial institution may limit its liability, based on the information provided on the FMS 133, when certain conditions outlined in the *Green Book* are met. If the conditions are met,

liability is limited to an amount less than or equal to two post-death payments. The RFC must also reconcile the amount refunded with the amount outstanding. After the amounts are reconciled, the funds are returned to the appropriate Federal agency's trust fund. The RFC is then required to notify the Federal agency of any remaining amount due the Government.

Objective, Scope, and Methodology

The objective of our audit was to determine whether FMS took adequate corrective actions to implement the recommendations in the OIG audit report titled *Audit Report of Financial Institutions Processing of Direct Deposit Electronic Funds Transfer (DD/EFT)*, OIG 93-044, dated March 25, 1993. We conducted the audit work at the FMS headquarters in Washington, D.C., and RFCs located in Chicago, Illinois, and Philadelphia, Pennsylvania.

To accomplish the audit objective, we conducted our fieldwork between September 1998 and February 1999. We interviewed personnel at FMS's headquarters to obtain information on actions taken by FMS to implement the audit recommendations contained in the 1993 OIG audit report. We also randomly selected a sample of 100 closed reclamation files for Fiscal Years (FY) 1997 and 1998, located in the Chicago and Philadelphia RFCs, to determine whether the reclamation process had improved. Finally, we reviewed documents such as: FMS 133, *Notification of Reclamation*; FMS 2942, *Follow-up to Notice of Reclamation*; FMS 135, *Request for Debit Electronic Funds Transfer Federal Recurring Payment*; and copies of checks.

This audit was conducted in accordance with the *Government Auditing Standards* issued by the Comptroller General of the United States, and included such tests as were deemed necessary.

Audit Results

Actions Taken to Ensure Financial Institutions Meet All Conditions for Limiting Liability

FMS completed or initiated actions reported in OIG-93-044 to ensure the Government recovers the correct amount of post-death benefit payments from financial institutions. In that report, to help FMS ensure that financial institutions meet all the conditions for limiting liability, the OIG recommended that FMS: (1) correct design weaknesses in the FMS 133;

(2) establish a monitoring program to identify financial institutions that do not comply with the *Green Book* requirements; 3) resolve the reclamation processing discrepancies between the *FOM* and the *Green Book*; and (4) work with payor agencies to enhance the reclamation interface capabilities between payor agencies. Also, the OIG recommended that FMS take appropriate enforcement action against financial institutions that failed to comply with the *Green Book* requirements for limiting liability.

FMS 133 Design Weaknesses

FMS revised the FMS 133 to help a financial institution report information necessary in determining whether the institution limited its liability. A financial institution is fully liable for all payments received after the recipient's death. However, the institution may limit its liability if it:

- had no knowledge of the death at the time of the deposit or withdrawal of any of the post-death payments;
- returned any post-death payments it received after it learned of the death; and
- met the procedural requirements contained in the *Green Book*.

In the previous audit, the OIG found that the information reported or missing on the former FMS 133 made it appear that a financial institution limited its liability. Therefore, the Government's opportunity to charge financial institutions for the full amount outstanding may have been lost. With the revised FMS 133, a financial institution is now required to provide certain information that will demonstrate how it limited its liability, such as: (1) the date the financial institution received the notice; (2) the date it learned of the death; and (3) a certification that it had no knowledge of the death or legal incapacity of the recipient, or the death of the beneficiary, at the time any payments listed on the FMS 133 were credited to or withdrawn from the account. Additionally, the revised form advises the financial institution that notification of death is for all types of Government benefit payments and appropriate measures to limit liability for all such payments should be taken by the institution.

Compliance Monitoring Program

To establish a monitoring system for compliance issues such as limiting liability, FMS is involved with NACHA, which recently established two working groups to review enforcement and compliance issues. In the current ACH network environment, ACH participants become parties to

a number of legal agreements which state that they will comply with NACHA's Operating Rules.

The working groups plan to review and monitor procedures to ensure all parties involved in ACH processing are in compliance with the rules and regulations, including adherence to the reclamation requirements. The working groups consist of representatives from the financial community, Federal Reserve Banks, credit unions, and the Government. While FMS will not be involved in penalties or other fees that may be imposed on financial institutions, FMS will participate in the working groups to ensure non-compliant financial institutions are identified (e.g., untimely response to the FMS 133 or questionable response provided to limit liability).

Reclamation Processing Discrepancies

FMS made the appropriate revisions to the *FOM* to agree with the *Green Book* requirements during this audit. Consistent procedures are important because RFCs use the *FOM* as guidelines in evaluating a financial institution's compliance; while financial institutions use the *Green Book*. Although FMS reported that the revisions were made, we found inconsistencies. When we brought this matter to the attention of FMS, the manager of Regional Operations' Payment Automation Branch in headquarters issued a memorandum, dated February 12, 1999, to the RFCs. The memorandum included the appropriate revisions to the *FOM*'s text to make it consistent with the *Green Book*. The RFCs were directed to use the memorandum changes as an updated supplement to the *FOM* procedures.

Enforcement Action on Wrongful Attempts to Limit Liability

Although FMS did not implement our recommendation to take enforcement action against a financial institution which failed to comply with the *Green Book* requirements for limiting liability, we believe that the subsequent actions taken by FMS and NACHA meet the intent of the recommendation. For example, as previously discussed, FMS corrected the design deficiencies in the FMS 133 to assist a financial institution in reporting certain information needed to demonstrate limited liability. Also, FMS will be working with NACHA to monitor financial institutions that do not comply with the requirements.

Additionally, by debiting the financial institutions' Federal reserve account for the full amount owed to the Government, FMS prevented wrongful limited liability claims resulting from the failure to timely and adequately respond to the FMS 133. Of the 100 closed reclamation cases that we

reviewed, 39 percent of the financial institutions did not adequately and/or timely respond to the FMS 133, or respond to the FMS 2942, *Follow-up to Notice of Reclamation*. Consequently, as required by the *Green Book*, the RFCs submitted an FMS 135, *Request for Debit Electronic Funds Transfer Federal Recurring Payment*, to the Federal Reserve in order to debit the applicable financial institution's Federal reserve account for the outstanding total. The FMS 135 is considered the final action, and the financial institution forfeits the right to limit its liability.

Sharing Death Notification Information Among Payor Agencies

FMS urged SSA to promptly share its "Death Notification Entry" (DNE) data with other agencies. The DNE information allows payor agencies to notify financial institutions of the recipient's death, thereby allowing the financial institutions sufficient time to voluntarily return payments received before FMS takes action to reclaim the payments. Also, as FMS obtains death notification information from one agency, it shares the information with other agencies. Sharing this information at the earliest possible time is important to prevent excess or erroneous Government payments.

Action Should Be Taken to Ensure Financial Institutions Return Reclamation Payments in a Cost-Effective Manner

In FYs 1997 and 1998, financial institutions sent paper checks for full reclamation payments rather than processing the payments through ACH. This condition was also noted in the OIG-93-044 audit report. To address the problem and two of our recommendations, FMS placed inserts with the FMS 133 and included instructions on the FMS 133 that full payments must be returned through the ACH. However, FMS took no action on our recommendation to impose a processing fee against financial institutions that did not comply with this requirement. As long as financial institutions submit paper checks, in lieu of the more cost-effective and timely ACH method, the Government incurs unnecessary processing fees and does not have immediate use of the funds.

In the OIG-93-044 report, the OIG reported that almost all financial institutions made full refunds in response to FMS 133 using paper checks instead of using the required ACH. ACH returns are more cost-effective and the payment is received in a more timely manner, as compared to the expense and delay associated with processing paper checks. Based on the relevant data from the 1993 audit, the OIG estimated that processing paper checks represented an estimated avoidable annual processing expense of at least \$40,000 for the FMS and an estimated \$53,000 annually in lost

interest to the RRB, OPM, and SSA trust funds. Therefore, the OIG recommended that FMS remind the financial institutions that full payments must be returned through an ACH, and that FMS should monitor the use of full refunds made with paper checks and seek a legislative change so that FMS can assess a processing fee on financial institutions that do not comply with the *Green Book* requirement.

During this audit, we found that FMS had not monitored those financial institutions that did not comply and had not made a decision to assess those financial institutions with a processing or service fee. We believe that FMS should take action on this recommendation, especially because FMS's reminders to the financial institutions have not been effective. Since financial institutions continue to issue paper checks for full refunds, the estimated annual processing expense and lost interest could be higher due to inflation. Of the 100 closed reclamation files for FYs 1997 and 1998 that we reviewed, 44 percent of the financial institutions sent in checks for full reclamation refund payments rather than use the ACH process.

During our exit conference, FMS informed us that it plans to automate the reclamation process. If the reclamation process is automated, then imposing a fee would become a moot point because there will no longer be a problem with handling paper checks. However, FMS is a long way from automating the reclamation process. Therefore, we believe that, in the interim, FMS should impose a processing or service fee for financial institutions that do not comply with the requirements.

Recommendation

FMS should assess a processing or service fee against financial institutions that do not comply with the *Green Book* ACH processing requirements. If a legislative change is required to make such assessments, then the FMS Commissioner should seek the necessary changes as soon as possible.

Management Response and OIG Comment

FMS management agreed that all returns should be by ACH, and proposed an alternative to the charging of fees. This alternative is explained in detail in the Commissioner's memorandum dated December 21, 1999, which is included as Appendix 3.

Among the actions FMS has taken or plans to take are a revision to the *Green Book*, and continued work with the financial community, including NACHA, to improve the processing of reclamations.

In addition, a review to determine if the entire reclamation process can be automated is planned for June 2000. Automation of the process would obviate the need to assess fees. The OIG believes that the proposed actions address the intent of the recommendation.

STATUS OF OIG-93-044 RECOMMENDATIONS

Recommendation	Corrective Action	Status of Recommendation
1. The FMS Assistant Commissioner, Regional Operations, should redesign the FMS 133 to ensure financial institutions have met all the conditions for limiting their liability. We suggest the form be changed so that financial institutions provide: (1) the date when the account was placed on "freeze" status and/or closed; (2) the name of withdrawer and their capacity; (3) certification on the "Date we received the notice" and the "Date we learned of the death," and (4) certification that they had no knowledge of the death when deposits and withdrawals of post-death payments were made.	FMS revised the FMS 133 on August 6, 1993.	Implemented.
2. The FMS Assistant Commissioner, Regional Operations, should establish a monitoring program to identify financial institutions that do not comply with the <i>Green Book</i> requirements for limiting their liability. We suggest a systematic sampling of partial, no refund, and no response cases.	FMS is involved with the NACHA in addressing compliance issues.	Ongoing.
3. The FMS Assistant Commissioner, Regional Operations, should take appropriate enforcement action against institutions that fail to comply with the <i>Green Book</i> requirements. In this regard, FMS should consider seeking legislative change to assess penalties against financial institutions in order to strengthen their ability to enforce compliance.	FMS changed the FMS 133 and is working with NACHA to identify wrongful limited liability claims. These actions met the intent of the recommendation.	Implemented.
4. The FMS Assistant Commissioner, Regional Operations, should resolve the reclamation processing discrepancies between the <i>FOM</i> and the <i>Green Book</i> relating to procedures for processing FMS Form 133. The <i>FOM</i> should conform with the requirements outlined in the <i>Green Book</i> .	During our fieldwork, FMS issued supplemental <i>FOM</i> guidance to ensure consistency.	Implemented.

STATUS OF OIG 93-044 RECOMMENDATIONS

Recommendation	Corrective Action	Status of Recommendation
5. The FMS Assistant Commissioner, Regional Operations, should modify the FMS 133 to advise financial institutions that notification of death is for all types of Federal benefit payments and that financial institutions should take the appropriate measures to limit their liability. In the meantime, FMS should inform financial institutions, through cover letters mailed with the FMS 133, <i>Newsgrams</i> , or some other means, that notification of death is for all types of Federal benefit payments and that financial institutions should take the appropriate measures to limit their liability.	FMS revised the FMS 133 on August 6, 1993.	Implemented.
6. The FMS Assistant Commissioner, Regional Operations, should work with payor agencies (RRB, OPM, SSA) to enhance the reclamation interfacing capabilities between payor agencies.	Since October 1, 1993, FMS has worked with agencies to ensure that the death notification information is shared between payor agencies.	Implemented.
7. The FMS Assistant Commissioner, Regional Operations, should inform financial institutions, through cover letters mailed with the FMS 133, <i>Newsgrams</i> , or some other means, to discontinue the use of full refund paper checks.	As of February 1, 1993, FMS has placed inserts with the FMS 133 reminding financial institutions to discontinue using full refund paper checks.	Implemented.
8. The FMS Assistant Commissioner, Regional Operations, should modify the FMS 133 to make it more explicit that paper checks should be used for partial refunds only.	FMS revised the FMS 133 on August 6, 1993.	Implemented.

STATUS OF OIG 93-044 RECOMMENDATIONS

Recommendation	Corrective Action	Status of Recommendation
9. The FMS Assistant Commissioner, Regional Operations, should monitor the use of full refunds made with paper checks, and seek a legislative change so that FMS can assess a processing fee on financial institutions that do not comply with this <i>Green Book</i> requirement.		Not implemented.
10. Once Recommendations 7-9 have been effectively implemented, the FMS Assistant Commissioner, Regional Operations, should evaluate the need to continue the Chicago Financial Center's lockbox services. We believe implementation of Recommendations 7-9 will significantly reduce the volume of paper checks received by the Chicago Financial Center and eliminate the need for the lockbox service.	FMS discontinued the use of the Chicago lockbox service on December 1, 1993.	Implemented.

Note: Recommendations 1-5 dealt with financial institutions limiting liability. Recommendations 6-10 dealt with financial institution compliance with the *Green Book* and *FOM* regarding the requirements for full refund payments, as cited in Recommendation 9.

ABBREVIATIONS

ACH	Automated Clearing House
DD/EFT	Direct Deposit Electronic Funds Transfer
DNE	Death Notification Entry
FMS	Financial Management Service
FOM	Field Operations Manual
FY	Fiscal Year
NACHA	National Automated Clearing House Association
OIG	Office of Inspector General
OPM	Office of Personnel Management
RFC	Regional Financial Center
RRB	Railroad Retirement Board
SF	Standard Form
SSA	Social Security Administration

MANAGEMENT RESPONSE



COMMISSIONER

DEPARTMENT OF THE TREASURY
FINANCIAL MANAGEMENT SERVICE
WASHINGTON, D.C. 20227

December 21, 1999

MEMORANDUM FOR DENNIS S. SCHINDEL
ASSISTANT INSPECTOR GENERAL FOR AUDIT
OFFICE OF INSPECTOR GENERAL

FROM:

RICHARD L. GREGG *Richard L. Gregg*

SUBJECT:

Financial Management Service's Reclamation of
Direct Deposit Post Death Benefit Payments

This is in response to your memorandum dated November 3, 1999 requesting Financial Management Service's (FMS) review and comments based on your Audit Report. The Audit Report involved the processing of Direct Deposit Electronic Funds Transfer (DD/EFT) return of payments by Financial Institutions, OIG-93-044, dated March 25, 1993.

Your letter recommends that financial institutions be charged a fee when full payments for reclamations are returned by check instead of through the Automated Clearing House (ACH). You also recommend that FMS pursue legislation to effect such fees, if necessary. While we agree that all returns should be by ACH, we would like to offer an alternative to the charging of fees. Our rationale and proposed actions are explained below:

1. Since the 1993 review, the TFS-133 form has been revised which includes a statement that financial institutions should return all full payments through the ACH. We agree that during your review there was a large volume of full payments returned by check. In fact, your office computed a check volume of 44% vs 56% ACH volume. However, we continue to see improvement and currently our Philadelphia Financial Center processes the largest volume of reclamations for the Social Security Administration and reports 90% of the total monthly payments received for reclamations are processed through the ACH. The remaining 10% are for full payments or partial payments and, as you know, partial payments can not be processed through the ACH. Right now based on the low volume of checks that are processed each month, we do not feel the cost and effort to

MANAGEMENT RESPONSE

Page 2 - Financial Management Service's Reclamation of Direct
Deposit Post Death Benefit Payments

enact legislation would be practical. In addition, it is doubtful that the fees collected from a small volume of check returns would offset the administrative cost of establishing and managing such a process to make it worthwhile.

2. FMS will continue to receive checks from some financial institutions that use a correspondent bank to process their ACH items. These financial institutions can not receive their ACH items directly from their ACH processors and, therefore, they use correspondent banks to process their ACH items. If the financial institution is notified of death and a payment must be returned, often the original payment information is not available to process an automated return and, therefore, the financial institution has no other alternative but to submit a check to the Government. We do not want to discourage this because the financial institution must use this method in some instances. We will continue to educate and train those financial institutions that they must receive all of the original payment information from their correspondent banks in order to process payment information to the Government.

3. We would prefer not to create an environment with the financial community where we start a practice of charging fees for non-compliance. In fact, our current 31 CFR 210 preempts a national system of fines and fees in the ACH area.

4. FMS will continue to work with the financial community including the National Automated Clearing House Association (NACHA) to improve the processing of reclamations. The following are ways FMS will continue its role for overall improvements.

- o FMS and NACHA have discussed new procedures that will be implemented in the near future to ensure that the financial institutions and the Government are in compliance with the ACH requirements. Further discussions have been delayed until after Y2K. Once implemented, this process will provide written

MANAGEMENT RESPONSE

Page 3 - Financial Management Service's Reclamation of Direct
Deposit Post Death Benefit Payments

notification to all ACH users when regulations and/or requirements are not followed properly. FMS plans to work with the private sector to ensure that all Government needs are met which will include identifying those financial institutions that are ACH compliant and should be using the ACH to return payments.

- o FMS is currently revising the Green Book which will emphasize how full payments should be returned to the Government.
- o Lastly, FMS plans to pursue the review of the automated reclamation proposal. An automated process could eliminate the need for payment returns based on a reclamation. While we cannot commit to a specific date because of other potential priorities, we anticipate a starting date of June 2000 for this effort.

We appreciate the time and effort you and your staff devoted to the review of the overall reclamation process. With respect to the disclosure, there is no material in the report that cannot be made available to the public. If you have any questions or require further assistance, you may contact John Scott at (202) 874-6820.

cc: D. Hammond (MT/OFAS)

MAJOR CONTRIBUTORS TO THIS REPORT

PROGRAM AUDITS DIRECTORATE

Maria V. Carmona, Acting Director

C. Samuel McGeorge, Audit Manager

Delores V. Dabney, Auditor-in-Charge

REPORT DISTRIBUTION

TREASURY DEPARTMENTAL OFFICES

Fiscal Assistant Secretary
Office of Strategic Planning
Office of Budget
Office of Accounting and Internal Control

FINANCIAL MANAGEMENT SERVICE

Commissioner
Assistant Commissioner, Management and Chief Financial Officer
Assistant Commissioner, Regional Operations

OFFICE OF MANAGEMENT AND BUDGET

Esther Rosenbaum, OIG Budget Examiner